

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

IN RE:            PARIS PRINCE

Case No.: 18-35832-KRH  
Ch. 13

TRUSTEE: **Suzanne E. Wade**  
Address: P.O. Box 1780  
Richmond, VA 23218

**ANSWER TO TRUSTEE’S MOTION TO DISMISS CASE FOR UNREASONABLE  
DELAY UNDER 11 U.S.C. §1307(C)(1)**

NOW COMES THE DEBTOR, by counsel, and for his answer to the motion to dismiss filed by the Trustee states as follows:

1. The Debtor's voluntary petition for Chapter 13 bankruptcy was filed electronically on November 20, 2018.
2. The Debtor's Chapter 13 plan and related motions were filed electronically on December 18, 2018.
3. On or about March 22, 2019, the Chapter 13 Trustee gave notice and filed a motion to dismiss for unreasonable delay that is prejudicial to creditors.
4. The Debtor is in good faith diligently attempting to cure the deficiency and has not engaged in unreasonable delay.
5. Debtor continues to need the protection of this court and the best interests of creditors would be served by continued administration of this case.

WHEREFORE the Debtor prays that the Court deny the Trustee's Motion to Dismiss, that no order be entered to his prejudice, and that he continues to receive the protection of the Court, and for such other and further relief as the nature of his case may require.

Respectfully Submitted:  
PARIS PRINCE  
By: /s/ Keith A. Pagano, Esq.  
Counsel for the Debtor

**CERTIFICATION OF SERVICE**

I hereby certify that I have this Thursday, March 28, 2019, mailed via electronic means or by first class mail, postage pre-paid a true copy of the foregoing Answer to Trustee's Motion to Dismiss, to all persons herein listed below and on the attached mailing matrix:

**U.S. Trustee-----**

U.S. Trustee's Office  
701 East Broad Street  
Richmond, VA 23219

**Trustee-----**

Suzanne E. Wade  
P.O. Box 1780  
Richmond, VA 23218

**Debtor-----**

Paris Prince  
800 Semmes Ave., Apt. 410  
Richmond, VA 23224

/s/ Keith A. Pagano, Esq.  
Keith A. Pagano, Esq. VSB# 47845  
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